



February 22, 2016

Dan Wenk, Superintendent
Yellowstone National Park
PO Box 168
Yellowstone National Park, WY 82190

RE: Environmental Assessment for the Use of Quarantine to Identify Brucellosis-free
Yellowstone Bison for Relocation Elsewhere

Dear Superintendent Wenk,

On behalf of the Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC) and the Montana Association of State Grazing Districts (MASGD), we appreciate the opportunity to provide comment regarding the Yellowstone Bison Quarantine Plan EA.

Our organizations represent land owners who run livestock on combined private, state and federal lands in Montana and have significant and long standing interest in the management of bison in and around Yellowstone National Park, due mainly to their high rate of exposure to *Brucella abortus*. As you are aware, this disease is highly regulated in domestic cattle and has broad implications for the marketing of cattle and genetics from Montana. The regulation of *B. abortus* by USDA APHIS has led to the implementation of strict testing and management protocols for cattle in an area surrounding Yellowstone National Park (YNP) known as the Designated Surveillance Area (DSA).

After an extensive review, MSGA, MASGD, and MPLC have serious concerns over this Bison Quarantine EA and make the following recommendations:

1. Reconsider the determination that an environmental impact statement is not required by the proposed action of developing a bison quarantine facility outside of YNP.
2. Full completion of the EIS on the future management of Yellowstone bison, prior to any development of a quarantine bison facility.

In the event, the National Park Service (NPS) disregards these recommendations and moves forward in the decision making process on the current EA, our organizations support Alternative 1- No Action: Bison would continue to be managed under the Interagency Bison Management Plan (IBMP). We are concerned that fast tracking a

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bison quarantine facility, will have significant cumulative effects on the ranching community. If the No Action alternative is not chosen, the development of a quarantine facility and the Alternative that places that facility in the YNP area and within the DSA, is the most responsible alternative.

Inadequate Disease Testing Requirements

The disease, brucellosis, remains a major threat to cattle producers in Montana. The EA is not sufficient in providing an adequate disease testing protocol to ensure brucellosis is not transmitted outside of YNP. As stated on page 7, the previous quarantine study has shown that 17% of the animals that initially tested negative for brucellosis converted to test-positive during the quarantine. During this quarantine, eighty-five percent of these conversions occurred within 120 days and none occurred after 205 days. In reviewing the study, an actual higher percentage of bison were reactors. Of the 112 bison in the second group that tested negative at the capture facility in 2008 and were transport to the quarantine facility, 27 or 24% were classified as reactors during the testing May through December of that year. Of these 27, 91% were culture positive for *Brucella abortus*. This data is even more concerning and shows that culture positive, potentially infectious bison will be present at any Quarantine facility. YNP should determine that based on disease risk, the alternative that places the Quarantine facility in YNP and within the DSA is the most scientifically acceptable alternative.

The bison in the previous study were tested every 30 -45 days. The current proposal does not require a testing protocol that is adequate to ensure brucellosis exposed animals are identified. As indicated on page 27, "The recipient must agree to test all bison for brucellosis exposure within 30 days of arriving at the quarantine facility to ensure they still test negative." The EA * then states, "Upon entry into the quarantine facility, it is recommended, but not required, for serological tests to be conducted on every bison every 30 to 45 days while they are in a holding pen or individual test groups until all animals that convert to test positive for brucellosis exposure have been removed and all remaining animals test negative." Given the risk of bison converting to test-positive, our organizations recommend any potential bison entering into a quarantine facility, be required to follow the strict testing protocol implemented in the previous * quarantine study. On page 28 the EA states, "*it is recommended the bison be retested for brucellosis exposure approximately one year later to verify they remain test negative. The recipient should vaccinate bison before they are released from the quarantine facility.*" Once again, we feel these disease monitoring steps are inadequate and should be changed from recommendations to requirements. Under this protocol, bison are only required to be tested twice, once by YNP prior to shipment and once by the recipient within 30 days of receiving the bison. Bison could convert to test-positive following the 30 days after arriving at the facility and never be required to be tested again. Brucellosis positive animals could become part of the animals graduating from the quarantine and released to other locations, due to the inadequate testing requirements provided in the EA. This lack of required disease testing could prove problematic as it puts Montana at risk for a spread of brucellosis, which is currently confined to the Greater Yellowstone Area.

Terminal Pastures

Our organizations are very opposed to the development of terminal pastures where bison testing positive for brucellosis exposure would be shipped to areas outside of YNP, instead of meat processing facilities, as stated on page 29. Under this proposal, some pregnant females testing

positive for brucellosis, could remain in a terminal pasture for nearly a year. This would clearly increase the risk potential of spreading brucellosis to other areas of the state. It is the legal responsibility of YNP and IBMP partners to continue to abide by the court settlement IBMP document, to manage the herd for a target of 3000 animals, but do so within the confines of the Park.

Quarantine Facility

The quarantine facility and potential bison entering that facility are discussed on pages 31 and 32 for alternatives 2 and 3. In our review, there is not sufficient or an adequate assessment of the actual size of a potential facility or even the number of animals entering into a quarantine situation. The EA states *"The necessary size of a quarantine facility to adequately care for the animals depends on the number of bison that would be consigned to quarantine and the length of time they remain in quarantine"* and *"The number of bison available for placement in quarantine would depend ..."*, both of these factors should be required to have been fully evaluated and presented for consideration, prior to any decision.

Environmentally Preferable Alternative

Under this section, the EA states, "The risk of brucellosis transmission from bison in quarantine to livestock, people, or other wildlife would be negligible provided the criteria and best practices described in the *Quarantine Facility Guidelines and Requirements, Roles and Responsibilities* sections of this document were followed." Our organizations disagree the risks are negligible, due to allowing likely exposed bison at the Fort Peck site, which greatly increases the risk of brucellosis transmission from bison to cattle. There are a far greater number of breeding cattle within travelling distance of a Fort Peck facility, versus a site that is within travelling distance of a YNP facility. There are also a number of tribal and non-tribal cattle producers within this area that will also face an increased risk of disease transmission.

The EA goes on to state, *"The Fort Peck Tribes have already demonstrated their ability to conduct brucellosis testing and manage bison originating from YNP."* Based on the bison that were transferred to the Reservation within the last 4 years, management actions have not met expectations. Two issues of concern have been accurate inventory control of bison and failure to capture or account for all animals in any year of the testing. Any quarantine facility must be required to account for one hundred percent of the animals at all times. For the 2015 testing cycle, the goal was to capture the entire herd. The results were gathering and testing of 139 head from an estimated herd of 183 adults and 73 calves. Without the ability to capture the animals, sufficient testing cannot occur.

Quarantine Associated Costs

The EA is incomplete as it does not include factual cost estimates. It fails to include the costs that would be associated with the facility, the capacity of the facility or where funding would come from to operate the quarantine project. These financial implications should be studied and documented for public review, prior making a determination of the feasibility of the project. On page 53, the EA states, *"The minimum quarantine periods and testing requirements recommended by APHIS (Table 1) are logistically difficult and relatively expensive to implement over several years."* Given this statement, it seems that some cost estimates were recognized, but they were not presented in the document for analysis. If the development of a quarantine

facility is "difficult" and "relatively expensive", it seems prudent to analyze those factors, before an alternative is selected.

Alternative 2

Our associations support Alternative 1, due to the reduced disease risk and incomplete analysis in the EA. If alternative 1 is not chosen, alternative 2 would provide the most likelihood of containing brucellosis to the GYA. It is also evident that a YNP site will have no impacts to wildlife and has extensive experience to operate a facility as stated on page 60, *"Wildlife species in the Stephens Creek area are familiar with the existing fencing patterns and bison management operations during winter. Construction of a quarantine facility would not impede wildlife migration through the area because wildlife would quickly adapt to the locations of any new fenced pastures and travel around them."* The EA also states on page 71, *"Staff would have the necessary experience and training to conduct capture, chemical immobilization, evaluations of bison behavior, marking, restraint, brucellosis testing, and sample collection."* Because up to 60% of the bison captured at YNP are exposed to brucellosis, it is imperative we localize the risk. This can be accomplished by at least locating such a facility in an area adjacent to or inside of YNP and within the Designated Surveillance Area (DSA).

Consultation and Coordination

Our organizations share the same concerns of the Director of the Wyoming Game and Fish Department. As stated on page 96, the director *"indicated the establishment of a quarantine facility or populations of bison may place additional areas at risk for the expansion of brucellosis and private property,"* and *"related concerns that other agencies would not be able to adequately fund disease surveillance, equipment, management and personnel."* It is our view, the preferred alternative has raised considerable concern for the establishment of wild bison populations or quarantine facilities outside of the national park, by a variety of agencies and organizations.

In conclusion, MSGA, MASGD, and MPLC recommend, conducting an EIS analysis for a bison quarantine facility, and completing a full EIS on the future management of Yellowstone bison, prior to any quarantine facility decision. In the event the NPS moves forward with a decision on the EA for the development of a quarantine facility, we support Alternative 1-No Action.

Thank you again for the opportunity to comment.

Sincerely,



Jay Bodner
Montana Stockgrowers Association
Montana Association of State Grazing Districts
Montana Public Lands Council